

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION AT CLEVELAND

GPH LOUISVILLE HILLCREEK LLC,
et al.

Judgment Creditors/Garnishors,

v.

REDWOOD HOLDINGS, LLC, *et al.*

Defendants/Judgment Debtors.

CASE NO.: 1:24-mc-00033-PAB

**AFFIDAVIT OF ELIZABETH NOLAND IN SUPPORT OF
REQUEST FOR WRIT OF NON-WAGE GARNISHMENT**

State of Kentucky)
)
County of Jefferson) ss:

The undersigned affiant, Elizabeth Noland, first being duly sworn, and pursuant to Federal Rule of Civil Procedure 64 and 69, and ORC § 2716.11, states as follows:

1. I am an attorney for judgment creditors, GPH Louisville Hillcreek LLC, GPH Louisville Camelot LLC, GPH Louisville Mt. Holly LLC, GPH Louisville St. Matthews LLC, GPH Frankfort LLC, GPH Kirtland LLC, GPH Vanceburg LLC, GPH Stanford LLC, and GPH Greensburg LLC (collectively, "Judgment Creditors"), with respect to the judgment entered in their favor against judgment debtors, Redwood Holdings, LLC ("Redwood"), Hillcreek Leasing, LLC ("Hillcreek"), Camelot Leasing, LLC ("Camelot"), Mt. Holly Leasing, LLC ("Mt. Holly"), St. Matthews Leasing, LLC ("St. Matthews"), Frankfort Leasing, LLC ("Frankfort"), Kirtland Leasing, LLC ("Kirtland"), Vanceburg Leasing, LLC ("Vanceburg"), Stanford Leasing, LLC ("Stanford"), Green Hill Leasing, LLC ("Green Hill") (Redwood,

Hillcreek, Camelot, Mt. Holly, St. Matthews, Frankfort, Kirtland, Vanceburg, Stanford, and Green Hill are together “Entity Debtors”), and Eli Gunzburg (“Gunzburg” and together with Entity Debtors, “Judgment Debtors”).

2. On May 1, 2024, the United States District Court for the Western District of Kentucky rendered judgment in Judgment Creditors’ favor against the Judgment Debtors, jointly and severally, for the following amounts: (1) \$1,059,523.45; and (2) post-judgment interest at the legal rate of 5.18% per annum from the date of the judgment pursuant to 28 USC § 1961.
3. Judgment Creditors registered the judgment in the United States District Court for the Northern District of Ohio on July 10, 2024.
4. The judgment remains unsatisfied.
5. As of July 23, 2024, after application of all payments received, the amounts due on the judgment are:
 - a. Principal owed by Judgment Debtors: \$1,059,523.45
 - b. Post-judgment interest owed by Judgment Debtors: \$12,480.32
6. Judgment Creditors seek to garnish money, property, or credits, other than personal earnings, of Gunzburg that garnishee, Ares Real Estate Income Trust Inc., 2405 York Road, Suite 201, Lutherville Timonium, Maryland 21093 (“Garnishee”), may have in its hands or control.
7. I have reason to believe and do believe that Garnishee may be indebted to Gunzburg or may have in its hands or control money, property, or credits (other than personal earnings) belonging to Gunzburg, including but not limited to funds belonging to Gunzburg that are held in investment and/or brokerage account(s) in Gunzburg’s name and over which the Garnishee has control, or in which Gunzburg has an interest that is not exempt under Ohio law or the United States.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND
CORRECT.

EBNoland

Affiant, Attorney for Judgment Creditors
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Subscribed and sworn to before me by the above affiant this 23rd day of July, 2024.

My commission expires: 10/23/25

Julie K MCKnight

Notary Public, State at Large

